

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

Case No. 17-BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS AND TRANSPORTATION  
AUTHORITY,

Debtors.

PROMESA

Title III

No. 17 BK 3567-LTS

AMERINATIONAL COMMUNITY SERVICES LLC, as  
Servicer for the GDB Debt Recovery Authority and CANTOR-  
KATZ COLLATERAL MONITOR LLC,

Plaintiffs,

v.

AMBAC ASSURANCE CORPORATION, ASSURED  
GUARANTY CORP., ASSURED GUARANTY MUNICIPAL  
CORP., FINANCIAL GUARANTY INSURANCE COMPANY,  
NATIONAL PUBLIC FINANCE GUARANTEE

Adv. Pro. No. 21-00068-LTS

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

CORPORATION, PEAJE INVESTMENTS LLC, and THE  
BANK OF NEW YORK MELLON as Fiscal Agent,

Defendants.

**[PROPOSED] ORDER GRANTING UNOPPOSED URGENT MOTION OF THE  
DEFENDANTS FOR LEAVE TO EXCEED PAGE LIMIT WITH RESPECT TO REPLY  
IN SUPPORT OF THE DEFENDANTS' MOTION TO DISMISS THE COMPLAINT**

Upon consideration of the *Unopposed Urgent Motion of the Defendants for Leave to Exceed Page Limit with Respect to Reply in Support of the Defendants' Motion to Dismiss the Complaint* (the "Urgent Motion"),<sup>2</sup> seeking leave to exceed the fifteen (15) page limit for memoranda of law in support of replies prescribed by the Case Management Procedures, the Court hereby FINDS AND DETERMINES that (i) the Court has jurisdiction to consider the Urgent Motion and the relief requested therein pursuant to Section 306 of PROMESA; (ii) venue is proper before this Court pursuant to Section 307(a) of PROMESA; (iii) the relief requested in the Urgent Motion is proper and in the best interest of the Title III debtors, their creditors, and other parties in interest; and (iv) due and proper notice of the Urgent Motion has been provided under the particular circumstances and no other or further notice need be provided. Accordingly, it is hereby ORDERED THAT:

1. The Urgent Motion is GRANTED as set forth herein.
2. The Defendants may exceed the fifteen (15) page-per-motion limit for replies set forth in the Case Management Procedures by filing a joint reply memorandum of law in further support of the Motion to Dismiss of no more than **forty (40) pages**, exclusive of the cover page, tables of contents and authorities, signature page, exhibits, certificate of service, and other required certifications.

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<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Urgent Motion.

3. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation or interpretation of this Order.

Dated: October \_\_, 2021

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